

Audit Question Processing Form

Control Number:
(For Staff use only)
AQ-69

Question Initiated By: Schin, Bob

Date: 7/21/2003

Regulatory Basis for Question:

Question:

Provide the basis for the statement that multiple hot shorts is not in the current licensing basis.

Response:

The Plant Hatch current licensing basis with respect to fire protection includes the Fire Hazards Analysis (FHA) and docketed correspondence with the NRC. Applicable regulations, such as 10 CFR Appendix R, and applicable regulatory guidance, such as Generic Letter 86-10, are also considered to be part of the Plant Hatch current licensing basis.

Based on SNC reviews of the Plant Hatch licensing basis and our long-standing fire protection design practices, which are consistent with industry practices, SNC has not identified any licensing basis document statement that would support multiple hot shorts being a part of the licensing basis. SNC's long held interpretation of the 10 CFR Appendix R and associated regulatory guidance has been that multiple hot shorts are not part of the Plant Hatch current licensing basis. This interpretation is consistent with industry interpretations of the same regulatory guidance pending the ongoing industry and NRC activities to complete NEI (NEI 00-01) and NRC guidance to address issues associated with associated circuits analysis. The Safe Shutdown Analysis Report, design information that supports the Plant Hatch current licensing basis, applies the licensing criteria that multiple hot shorts are not required to be considered.

Again, please note that SNC believes that all questions associated with the issue of consideration of multiple hot shorts fall into the category of associated circuits, inspection of which was temporarily suspended as of 11/29/2000 (ML003773142). This inspection scope reduction is referenced in NRC Inspection Procedure 71111.05. This suspension recognizes the ongoing industry and NRC activities to complete NEI (NEI 00-01) and NRC guidance to address issues associated with associated circuits analysis. Once these activities are completed, currently scheduled for this fall, SNC will review the applicable guidance and determine if any additional actions are appropriate.

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Response by: Tully, Cindy

Reviewed by: Luker, Ira

Staff init: 

NRC Status: In Progress